

Mr. Samuel Schlosser
Plymouth Foundry, Incorporated
523 West Harrison Street
Plymouth, IN 46563

Re: **SPM 099-11440-00003**
First Significant Permit Modification to
Part 70 No.: T 099-7366-00003

Dear Mr. Schlosser:

Plymouth Foundry, Incorporated was issued a permit on July 21, 1999 for grey iron foundry. A letter requesting changes to this permit was received on October 21, 1999. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The changes to the permit are as follows with deletions appearing as ~~strikeouts~~ and new language in **bold**:

~~D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.~~

D.4.8 Record Keeping Requirements

- (a) To document compliance with Condition D.4.4, the Permittee shall maintain records of daily visible emission notations of each facility and the results of the inspections required under Condition D.4.5.
- (b) To document compliance with Condition D.4.7, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - ~~(A)~~ Inlet and outlet differential static pressure; and
 - ~~(B) Cleaning cycle: frequency and differential pressure.~~

D.5.8 Record Keeping Requirements

- (a) To document compliance with Condition D.5.4, the Permittee shall maintain records of daily visible emission notations of each facility and the results of the inspections required under Condition D.5.5.
- (b) To document compliance with Condition D.5.7, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - ~~(A)~~ Inlet and outlet differential static pressure; and
 - ~~(B) Cleaning cycle: frequency and differential pressure.~~

~~D.7.2 Volatile Organic Compounds (VOC)~~

~~Any change or modification which may increase potential VOC emissions to twenty-five (25) tons per year from the surface coating operations and the dip tank shall obtain prior approval from IDEM, OAM pursuant to 326 IAC 2-1 before such change may occur.~~

~~D.7.4 Record Keeping Requirements~~

~~(a) To satisfy the requirements of Condition D.7.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly.~~

~~(1) The amount of VOC of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~

~~(2) A log of the dates of use;~~

~~(3) The cleanup solvent usage for each month;~~

~~(4) The total VOC usage for each month; and~~

~~(5) The weight of VOCs emitted for each compliance period.~~

~~(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Frank P. Castelli, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 516-691-3395 or in Indiana at 1-800-451-6027 (ext 516-691-3395).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
FPC/MES

cc: File - Marshall County
U.S. EPA, Region V
Marshall County Health Department
Air Compliance Section Inspector - Rick W. Reynolds
Compliance Data Section - Jerri Curless
Administrative and Development - Janet Mobley
Technical Support and Modeling - Nancy Landau

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT**

**Plymouth Foundry, Incorporated
523 West Harrison Street
Plymouth, Indiana 46563-0537**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 099-7366-00003	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: July 21, 1999
First Significant Permit Modification SPM 099-11440-00003	Pages Affected: 29, 35, 38, 40 and 41
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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D.5.5 Baghouse Inspections

D.5.6 Broken or Failed Bag Detection

D.5.7 Parametric Monitoring

Emergency/Deviation Occurrence Report

FACILITY OPERATION CONDITIONS

(a) Two (2) electric induction furnaces (iron), installed in 1986, capacity: 1.5 tons of iron per hour, each.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:

Inlet and outlet differential static pressure; and
 - (2) Documentation of all response steps implemented, per event.
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

- (b) To document compliance with Condition D.5.7, the Permittee shall maintain the following:
- (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - Inlet and outlet differential static pressure; and
 - (2) Documentation of all response steps implemented, per event.
 - (3) Operation and preventive maintenance logs, including work purchase orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

FACILITY OPERATION CONDITIONS

(g) One (1) surface coating operation, consisting of an airless spray applicator and dip tank system, equipped with an 11,000 actual cubic feet per minute exhaust fan, installed in 1976, capacity: 120 iron parts per hour.

D.7.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$F = 4 \cdot 10 \cdot P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.7.2 Deleted

D.7.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.7.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.7.4 Deleted

Plymouth Foundry, Incorporated
Plymouth, Indiana
Permit Reviewer:MES

First Significant Permit Modification
SPM 099-11440-00003
Amended by MES

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Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Plymouth Foundry, Incorporated
Source Location:	523 West Harrison Street, Plymouth, Indiana 46563-0537
County:	Marshall
SIC Code:	3321
Operation Permit No.:	T 099-7366-00003
Operation Permit Issuance Date:	July 21, 1999
Permit Modification No.:	SPM 099-11440-00003
Permit Reviewer:	Frank P. Castelli

The Office of Air Management (OAM) has reviewed a Petition for Review & Stay of Effectiveness from Plymouth Foundry, Incorporated relating to the operation of a grey iron foundry. This petition has resulted in this proposed significant permit modification to the Part 70 Operating Permit.

History

On October 12, 1999, Plymouth Foundry, Incorporated submitted a petition to the OAM requesting the deletion of certain permit conditions from their Part 70 Operating Permit. Plymouth Foundry, Incorporated was issued a Part 70 permit on July 21, 1999.

Permit Modification

Pursuant to 326 IAC 2-7-12(d), this proposed significant permit modification to the Part 70 Operating Permit, T 099-7366-00003, issued on July 21, 1999, is required to incorporate the proposed changes in the Part 70 Operating Permit conditions since the conditions involve a significant change in compliance monitoring conditions and a relaxation of record keeping conditions.

Plymouth Foundry, Incorporated requested that Conditions, D.1.3, D.4.8(b)(1)(B), D.5.8(b)(1)(B), D.7.2 and D.7.4 be deleted from the Part 70 Operating Permit. The requests and the rationale for deleting each condition are as follows:

Request to Delete Condition D.1.3, Preventive Maintenance Plan, page 29 of 49

In its permit application, Plymouth Foundry showed that the electric induction furnaces comply with the applicable legal requirements, without the need for any emission control equipment. 326 IAC 1-6-3 requires a Preventive "Maintenance" Plan ("PMP") for emission control devices. As no such devices are required to meet air pollution rules, no air pollution control devices exist and this emission unit should not be subject to any requirement for a PMP under the rule. Even if IDEM could require a PMP for a "facility" and not just the emission control device, there still is no basis for requiring a PMP for these emission units. 326 IAC 2-7-5(3) provides that a permit may impose only those monitoring, record keeping and reporting requirements which assure that all "reasonable" information is provided. There is nothing about the electric induction furnaces to be maintained that controls whether the emissions will comply with the emission limitation. If the electric induction furnaces are not maintained they will simply cease to operate and cease to emit any emissions to the atmosphere. Thus this PMP requirement is not reasonably required monitoring by IDEM. In addition, IDEM is treating this emission unit differently than other emission units which meet the

emission limitation without a control device. In other such cases, IDEM does not impose the PMP requirement when no control is required to meet the limit and none should be required here. Therefore, a PMP is not properly required for the two electric induction furnaces.

Rationale to Delete Condition D.1.3

Proposed Condition D.1.3, Preventive Maintenance Plan (PMP), can be deleted as shown below since the facilities are not equipped with control devices and the actual emissions for these facilities are under twenty-five (25) tons per year. These facilities comply with all applicable rules without the need for control devices.

~~D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.~~

Request to Delete Conditions D.4.8(b)(1)(B) and D.5.8(b)(1)(B) Record Keeping Requirement, pages 35 and 38 of 49

326 IAC 2-7-5(3) provides that a permit may impose only those monitoring, record keeping and reporting requirements which assure that all "reasonable" information is provided. There is no cleaning cycle frequency or differential pressure specified in the permit. There is nothing about the cleaning cycle frequency and cleaning jet pressure that is relevant to determining compliance with Permit Condition D.4.1 and rule 326 IAC 6-3-2. The requirement to monitor the pressure drop across the baghouse, as is required by Permit Condition D.4.7 is adequate to demonstrate that the cleaning program is being effective. This permit condition exceeds the authority of 326 IAC 2-7-5(3).

Rationale to Delete Conditions D.4.8(b)(1)(B) and D.5.8(b)(1)(B)

The requirements to monitor the pressure drop across the baghouses, as is required by Permit Conditions D.4.7 and D.5.7 are adequate to demonstrate that the cleaning programs are being effective. Therefore, Conditions D.4.8(b)(1)(B) and D.5.8(b)(1)(B) are deleted as follows:

D.4.8 Record Keeping Requirements

- (a) To document compliance with Condition D.4.4, the Permittee shall maintain records of daily visible emission notations of each facility and the results of the inspections required under Condition D.4.5.
- (b) To document compliance with Condition D.4.7, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - ~~(A)~~ Inlet and outlet differential static pressure; and
 - ~~(B)~~ Cleaning cycle frequency and differential pressure.

D.5.8 Record Keeping Requirements

- (a) To document compliance with Condition D.5.4, the Permittee shall maintain records of daily visible emission notations of each facility and the results of the inspections required under Condition D.5.5.
- (b) To document compliance with Condition D.5.7, the Permittee shall maintain the following:

- (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) ~~Cleaning cycle, frequency and differential pressure.~~

Request to Delete Condition D.7.2, Volatile Organic Compounds (page 40 of 49) and Condition D.7.4, Record Keeping Requirements, page 41 of 49

As shown in the Technical Support Document in Appendix A, page 1 of 7, the potential emissions for this emission unit (calculated based on 8,760 hours of operation per year at full rated capacity) are 18.4 tons per year. The only way the VOC rule could become applicable is if the potential emissions were increased by 6.6 tons per year or 36 pounds per day. An increase of that magnitude would require a permit modification and the requirement to obtain such a permit modification. The requirement to obtain a permit modification for such a change is already contained in Permit Condition B.23 on page 18 of 49. Plymouth Foundry has a demonstrated history of compliance with the permitting rules. Permit Condition D.7.2, which requires a permit modification to increase emissions to 25 tons per year, is duplicative of Permit Condition B.23 and unnecessary. Permit Condition D.7.4, which requires records be kept to demonstrate that this emission unit is not being operated in excess of 3,760 hours per year at full rated capacity, is onerous, extremely expensive and not necessary since the emissions can only be increased if a permit modification is first obtained. As such this condition exceeds the authority of 326 IAC 2-7-5(3) which allows only those record keeping requirements which assure that "reasonable" information is provided.

Rationale to Delete Conditions D.7.2 and D.7.4

Condition D.7.2 is not required to avoid the requirements of 326 IAC 8-1-6 since the potential VOC emissions are less than twenty-five (25) tons per year, nor is it a limit to comply with or avoid any other Article 8 Rule. Since Condition D.7.2 duplicates Condition B.23, Condition D.7.2 has been deleted.

The record keeping requirements of Condition D.7.4 can be deleted since there is no emission limit specified in Section D.7. Conditions D.7.2 and D.7.4 are deleted as follows:

D.7.2 Volatile Organic Compounds (VOC)

~~Any change or modification which may increase potential VOC emissions to twenty-five (25) tons per year from the surface coating operations and the dip tank shall obtain prior approval from IDEM, OAM pursuant to 326 IAC 2-1 before such change may occur.~~

D.7.4 Record Keeping Requirements

(a) ~~To satisfy the requirements of Condition D.7.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly.~~

(1) ~~The amount of VOC of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~

(2) ~~A log of the dates of use;~~

(3) ~~The cleanup solvent usage for each month;~~

(4) ~~The total VOC usage for each month; and~~

~~(5) — The weight of VOCs emitted for each compliance period.~~

~~(b) — All records shall be maintained in accordance with Section C — General Record Keeping Requirements, of this permit.~~

Conclusion

The operation of this grey iron foundry shall be subject to the conditions of the attached proposed Significant Permit Modification SPM 099-11440-00003.